



February 24, 2012  
**Via ECFS Filing**

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, Suite TW-A325  
Washington, DC 20554

RE: G3 Telecom USA Inc.  
EB Docket No. 06-36; 2011

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2011 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of G3 Telecom USA Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [stthomas@tminc.com](mailto:stthomas@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas  
Consultant to G3 Telecom USA Inc.

cc: Rajan Arora -  
file: G3 Telecom USA Inc. - FCC - Other  
tms: FCx1201

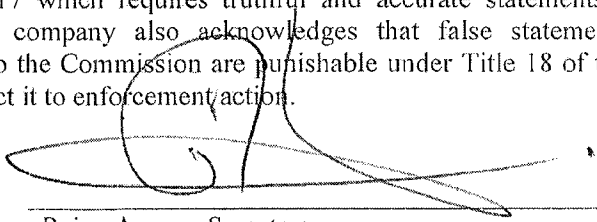
Enclosures  
ST/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification	Covering calendar year 2011
Name of company(s) covered by this certification:	G3 Telecom USA Inc.
Form 499 Filer ID:	828681
Name of signatory:	Rajan Arora
Title of signatory:	Secretary

1. I, Rajan Arora, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
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Rajan Arora, Secretary

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Date February 23, 2012

**Attachments:** Accompanying Statement explaining CPNI procedures

## ATTACHMENT A

### Statement of CPNI Procedures and Compliance

## **Statement of CPNI Procedures and Compliance**

G3 Telecom USA Inc. does not use or permit access to CPNI to market any telecommunications or non-telecommunications services and has trained its personnel that they are not to use CPNI for marketing purposes. Should G3 Telecom USA Inc. elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

As set forth below, G3 Telecom USA Inc. has processes and procedures in place to safeguard its customers' CPNI, including call detail information, from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

G3 Telecom USA Inc. does not disclose CPNI to any agents, affiliates, joint venture partners or independent contractors, nor does it use CPNI to identify or track customers who call competing providers. The Company has a strict policy prohibiting the disclosure of CPNI to any third parties, unless required to do so by law (e.g., in response to a subpoena). The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI pursuant to legally authorized requests.

G3 Telecom USA Inc. has instituted procedures to safeguard the disclosure of call detail over the telephone and all employees are trained to follow these procedures. Under these procedures, the Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative or the customer has previously established and is able to provide a password. Customers who wish to access call detail records via telephone create customer-selected passwords at the time they initially establish service with G3 Telecom USA Inc. when their identity is easily authenticated. If a customer does not select a password at the time their account is created, but subsequently wishes to obtain a password in order to access their call detail information over the telephone, the Company will authenticate the customer's identity without the use of readily available biographical information or account information. Passwords assigned do not rely on readily available biographical information or account information. If the customer either does not have a pre-established password or cannot provide the correct password, the Company will not provide call detail information over the telephone, but will instead send the requested information to the customer's address of record.

If a customer loses or forgets their password, the Company will re-authenticate the customer's identity by requiring the customer to send a letter signed by the customer who has previously been identified as authorized to obtain or discuss information regarding the customer's telephone service with G3 Telecom USA Inc. The Company will then mail the password to the customer's address of record.

G3 Telecom USA Inc. notifies customers whenever a password or address of record is created or changed without revealing the changed information or sending the notification to the new account information. Specifically, G3 Telecom USA Inc. sends a notice to the customer's address of record informing the customer that such account changes have been made.

G3 Telecom USA Inc. does not disclose CPNI on-line. If it elects to do so in the future, it will

follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

G3 Telecom USA Inc. does not have any retail locations and therefore does not disclose CPNI in-store.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

The Company has not had any breaches of its customers' CPNI during the past year, but does have processes in place to ensure that it maintains electronic records of any breaches that are discovered and of notifications made to the USSS and the FBI, as well as to customers.

G3 Telecom USA Inc. has not taken any actions against data brokers in the last year and did not receive any customer complaints about the unauthorized release or disclosure of CPNI in calendar year 2011.

G3 Telecom USA Inc. has not developed any information with respect to the processes pretexters are using to attempt to access CPNI, but does take steps to protect CPNI from pretexters as described in this Statement.